



ENERGY AND ENVIRONMENT CABINET

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March 9, 2016

Ms. Tracey Duncan
U.S. Department of Energy
Portsmouth/Paducah Project Site Office
5501 Hobbs Road
Paducah, Kentucky 42053

RE: Submittal of Comments to the Addendum to the Remedial Action Work Plan for Optimization of the Northeast Plume Interim Remedial Action - Appendix D Quality Assurance Project Plan (1280&D2/R2/A1)
Paducah Site
Paducah, McCracken County, Kentucky
KY8-890-008-982

Ms. Duncan:

The Division of Waste Management (Division) has completed its review of the subject report and comments to the subject document have been included as an attachment.

If you have any questions or require additional information, please contact Brian Begley at (502) 564-6716, ext. 4690 or e-mail at brian.begley@ky.gov.

Sincerely,

Bill Schneider

For April J. Webb, P.E., Manager
Hazardous Waste Branch

AJW/bb/mg/lww

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DWM File: #1210-G; Graybar: ARM20160007 (NE Plume IRA RAWP Optimization –
Appendix D QAPP)

**Kentucky Division of Waste Management's Comments to the
Addendum to the Remedial Action Work Plan for Optimization of the Northeast Plume
Interim Remedial Action (Appendix D QAPP)**

Paducah Site, Paducah, Kentucky

DOE/LX/07-1280&D2/R2/A1

March 7, 2016

Specific Comments:

1. Page D-9, 1. Identify Guidance Used to Prepare QAPP, 6th Reference Cited:

All of the other five references listed in this section include a month, year, version, and total number of pages. Please add this level of detail to the following reference “*Paducah Gaseous Diffusion Plant Programmatic Quality Assurance Project Plan*, DOE/LX/07-1269&D2/R2.” It is also noted that the DOE changed the document code from 1269&D2/R2 to 2402&D1 (official transmittal date of March 7, 2016). If DOE does not reference the 2016 version of the document please explain the rationale.

2. Page D-19, QAPP Worksheet #9:

The title of QAPP Worksheet #9 is Project Scoping Session Participant Sheet. Was the participant sheet for project scoping intended to be attached to this QAPP worksheet? Section 4 of the O&M Plan (DOE/OR/07-1535&D3/R4) does make reference to the ‘NEPCS team’ but does not reference either a date or participant list. Please clarify the intent of this worksheet and add the participant list and date(s) of scoping meeting(s), if warranted.

3. Page D-22, QAPP Worksheet #10, Problem Definition, #10, 2nd Sentence:

Typo: ‘he’ should be ‘the’

4. Page D-23, QAPP Worksheet #11, Project Quality Objectives/Systematic Planning Process Statements, 3rd Question, last sentence:

The question is “What type of data is needed? Target analytes, analytical groups, field screening, on-site analytical or off-site laboratory techniques, sampling techniques.” The second footnote on Page D-21 indicates that quarterly parameters will also include gross alpha and beta, which is not mentioned in Table 4 or included in this section. Please explain.

5. Page D-24, QAPP Worksheet #12, Measurement Performance Criteria, Measurement Performance Criteria Column:

The 90% designation should have a greater than or equal sign associated with it.

6. **Page D-26, QAPP Worksheet #13, Secondary Data Criteria and Limitations Table, Limitations on Data Use Column, Last Sentence:**

Please add that a three-party FFA discussion will occur prior to the following statement “Use of historical data may be limited based on how long ago the data were collected and whether site conditions have changed since data collection.”

7. **Page D-27, QAPP Worksheet #14, Summary of Project Tasks*, Footnote *:**

Please clarify what is meant by the footnote statement “It is understood that SOPs are contractor specific.” Does this mean that DOE does not assure that contractor’s SOPs will meet all DQOs for the project? If a language change to the footnote is proposed, the phrase in question appears below multiple tables in Appendix D.

8. **Page D-28, QAPP Worksheet #16, Project Schedule/Timeline Table, Activities Column:**

Please add ‘Preoperational’ sampling to the Activities column to distinguish that not all sampling activities are considered as routine.

9. **Page D-28, QAPP Worksheet #16, Project Schedule/Timeline Table, Deliverable Column:**

The MOA requires project data to be delivered more frequently than semi-annually. Please add additional language or reference the project schedule for the frequency that project data will be conveyed to regulators.

10. **Page D-32, QAPP Worksheet #17-B, Sampling Design and Rationale (Groundwater Monitoring), Project Reference Value Column:**

What is the intent behind the ‘Project Reference Value’ Column and why are the cells for specific conductance and turbidity considered to be not applicable?

11. **Page D-33, QAPP Worksheet #18, Sampling Locations and Methods/Standard Operating Procedure requirements Table for Screening Samples, Concentration Level Column:**

For clarity, consider adding a footnote to link the MOA to the screening values (600 µg/L TCE and 200 pCi/L Tc-99).

12. **Page D-34, QAPP Worksheet #19, Analytical SOP Requirements Table, Preservation Requirements (Chemical, Temperature, Light Protected) Column:**

This column does not indicate if light protection is necessary. Consider expanding the footnote associated with rad water samples to have the option for not maintaining cooling to <4°C.

13. Page D-34, QAPP Worksheet #19, Analytical SOP Requirements Table, Multiple Columns:

Consider placing values in the concentration column and the analytical and preparation column instead of referencing other QAPP Worksheet numbers.

14. Page D-38, QAPP Worksheet #21, Project Sampling SOP References Table, Footnote ‘a’:

Footnote ‘a’ specifies that “SOPs are posted to the FPDP S/Drive.” Will the SOPs be maintained at any other accessible location other than the contractors S/Drive? If so, please specify the location.

15. Page D-54, QAPP Worksheet #36, Validation (Steps IIa and IIb) Summary Table, Data Validator Column and Footnote ‘a’:

The last sentence in footnote ‘a’ states “This could be an outside party [Data Validator] or someone within FPDP who is not involved in the project.” Is this footnote implying that independent data validation or third-party independent data validation may be performed by a FPDP staff member as long as they are “a qualified individual, independent from sampling, laboratory, project management, or other decision making personnel for the task?” Please explain.

-End of KY Comments-